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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

To Whom It May Concern:

Florida International University students Miami, Florida have formed a research group to make **public comment on the Federal Communications Commission's proposed rule concerning wireless E911 compatibility; call back capability**. This rule solicits comments regarding the Commission's options with respect to providing public safety answering points (PSAPs) with the ability to call back to obtain further information from 911 calls made from non-service initialized mobil wireless phones.

E911 wants to establish a system for call back capability. As of right now, if your phone does not have this service and you dial 911, get disconnected, there is no way the emergency service will be able to get in contact with you or know where you are. The phones that are included in this rule are non-initialized phones that one can get through donor programs, and emergency outgoing 911 phones that have limited usage and are incapable of receiving any incoming calls. E911 wants to require wireless carriers to forward all calls regarding 911 to the PSAP service. The PASP service can be critical to the E911 call situations, where the caller may not know their location, and the mobile phone does not have the criteria to provide this information.

There are some drawbacks in regard to technological constraints and the importance of adding this service for public safety reasons considering the costs involved. The public safety view of this service has led the Commission to realize that additional information is necessary. We propose that more time and cost evaluation is necessary. It is not the financial responsibility of service carriers to fund this proposed rule. Cell phone manufacturers need to at least label these phones properly to inform consumers of their E911 drawbacks.

The proposed rule has many positive and negative effects. The costs involved in the whole program of bringing new numbers into play have a lot of consequences and are the biggest concern with this proposed rule. The FCC has done extensive research on the subject. The FCC has estimated the annual reporting and record keeping cost burden to be \$7,858,650.00. Under this program, the carriers and manufacturers will incur the costs. This is terrible news for carriers and cell phone manufacturers. We feel that the carriers and manufacturers will not be as willing to help with this program (donate phones to battered women, public safety watches, and the elderly) because of the costs involved with this proposed rule. Even though the different carriers and manufacturers can split the cost, financially this implementation would be burdensome.

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Stakeholders (cell phone manufacturers and service carriers) are unanimously in favor of waiving the proposed rule. After researching the reaction of such companies as Nokia, Ericsson, AT&T, Sprint PCS, Cingular, Motorola, etc... we found they are concerned about their pocketbooks. Sure they are concerned about public safety, but the almighty dollar speaks louder.

On the other hand, if these carriers and manufacturers do incur the cost of this new program they will find a way to simplify its costs. For example, they will not hesitate to raise the prices of their regular customers, new customers, or the cell phones themselves. 911 Emergency only cell phones are inexpensive non-serviced phones; if this rule passes and manufacturers absorb the costs - the inexpensive phones may now become too expensive for the average person who is in need to afford.

The commission found that mandatory data collection is necessary to efficiently monitor and manage numbering use. If this program is adopted the requirements will include: (A) All carriers that receive numbering resources from the NANPA or that receive numbering resources from a Pooling Administrator in thousands-blocks must report forecast and utilization data semi-annually to the NANPA, (B) Applications for proof that (1) the applicant is authorized to provide service in the area for which the numbering resources are requested (2) the applicant is or will be capable of providing service within 60 days of the numbering resources activation date. (C) Applications for growth numbering resources must include a months-to-exhaust worksheet. (D) To facilitate auditing by the NANPA and by state commissions in the future, carriers are required to maintain detailed internal records of their number usage in categories more granular than the five for which they are required to report.

These are just few of the many steps the carriers would have to take in order to aid the program. Which of course, we will end up paying for. Any cost a big company incurs will always be deviated to the consumers.

A second alternative for 911-only phones would be a requirement that manufacturers label these phones and educate consumers regarding the absence of call back capability. Requiring manufacturers to label 911-only handsets would put consumers on notice concerning the product's capabilities and limitations. The requirement would apply only prospectively and would not cover previously marketed or donated handsets. It could be easier and less expensive to implement than an encoding requirement or a mandatory call back requirement. However, we are concerned that labeling, like encoding a non-dialable number, is insufficient to ensure the benefits of our E911 requirements because it cannot take the place of a PSAP's ability to recontact a 911 caller if the PSAP needs vital information concerning the caller's location or specific emergency needs prior to dispatching emergency services.

Labeling is certainly a temporary solution until technology and costs involved have been further explored and negotiated. At least if consumers are aware of the limitations of non-serviced 911 cell phones when calling they will be more apt to give their location first. This will allow PSAPs to at least locate the distressed person if losing the connection.

The proposed rule requires more time to decide who will be responsible for the costs involved in implementing a numbering system for call back and for technology to be

explored for other possible solutions. In order to buy time and protect the consumer labeling should be implemented by any further manufactured and sold E911 only cellular phones.

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